

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

JUAN LOZADA-LEONI,

Plaintiff,

v.

**MONEYGRAM INTERNATIONAL, INC. and
MONEYGRAM PAYMENT SYSTEMS, INC.,**

Defendants.

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Civil Action No. 4:20-cv-00068--RWS-CMC

DEFENDANTS' DEPOSITION DESIGNATIONS

TO: Plaintiff, by and through counsel of record, Susan E. Hutchison and S. Rafe Foreman, Hutchison & Stoy, PLLC, 505 Pecan Street, Suite 101, Fort Worth, Texas 76102, and 1312 Texas Avenue #101, Lubbock, Texas 79401.

Defendants submit their Deposition Designations as follows. Defendants contend that these designations fall into the category of "rebuttal" designations, but make them now out of an abundance of caution. Defendants also reserve the right to use any or all portions of the deposition testimony designated by Plaintiff. Defendants, and to provide (additional) rebuttal designations and objections.

Deposition Designations of John Tyson

Deposition Date: October 10, 2018

Pages: 5:10-11; 7:13 – 9:16; 24:25 – 25:10; 25:12; 26:2-6; 29:6-16; 30:16-19; 31:3-12; 31:21 – 32:15; 34:2-20; 34:23 – 36:11; 36:14 – 37:4; 37:7-16; 69:5-18; 71:17 – 73:14; 75:25 – 80:21; 81:10 – 82:3.

Deposition Designations of Dana Johnson

Deposition Date: June 30, 2020

Pages: 6:10-12; 7:8 – 9:3; 10:8 – 11:9; 13:12-19; 15:2-16; 16:17 – 17:1; 22:21 – 23:21; 26:23 – 27:16; 32:7 – 33:3; 40:25 – 41:2; 41:14 – 42:10; 63:9-24; 70:9-12; 70:14 – 71:10; 120:14-15; 120:17 – 121:3; 121:5 – 122:11; 123:2-15; 123:17 – 124:19; 124:21 – 125:2; 125:4-21; 135:14 – 137:2; 142:21-25; 143:2-9; 151:19 – 152:5; 152:8-11; 152:14-16; 152:18; 154:9-15; 154:21 – 155:15; 155:23 – 156:12; 156:19-25; 157:3-12; 157:15-20; 158:5-14; 158:23 – 160:9.

Deposition Designations of Juan Manuel Gonzalez

Deposition Date: January 22, 2020

Pages: 5:1 – 92:5

Deposition Date: January 23, 2020

Pages: 142:2 – 147:25

Deposition Designations of Derya White

Deposition Date: July 10, 2020

Pages: 290:1 – 291:1

Respectfully submitted,

By: /s/ John M. Barcus

GARY D. EISENSTAT

Texas State Bar No. 06503200

gary.eisenstat@ogletree.com

JOHN M. BARCUS

Texas State Bar No. 24036185

john.barcus@ogletree.com

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

Preston Commons West

8117 Preston Road, Suite 500

Dallas, Texas 75225

214.987.3800 (Phone)

214.987.3927 (Fax)

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2020, the foregoing document was served via email on all counsel of record.

/s/ John M. Barcus

JOHN M. BARCUS

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